

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.* §
ALEX DOE, Relator, THE STATE OF §
TEXAS, *ex rel.* ALEX DOE, Relator, THE §
STATE OF LOUISIANA, *ex rel.* ALEX DOE, §
Relator,

No. 2:21-cv-022-Z

Plaintiffs,

Date: September 1, 2023

v.

PLANNED PARENTHOOD FEDERATION §
OF AMERICA, INC., PLANNED §
PARENTHOOD GULF COAST, INC., §
PLANNED PARENTHOOD OF GREATER §
TEXAS, INC., PLANNED PARENTHOOD §
SOUTH TEXAS, INC., PLANNED §
PARENTHOOD CAMERON COUNTY, §
INC., PLANNED PARENTHOOD SAN §
ANTONIO, INC.,

Defendants.

EXHIBIT B

Additional Non-Party Contact Information Defendants Seek to Redact

| Filing | Appendix Page | Document Name | Non-Party Contact Info. |
|--------|-------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| 475-1 | Appx. 436 | PPGT Electronic Funds Transfer (ETF) Notification | Non-Party Name (Initials S.E.) |
| 475-4 | Appx. 2586 through Appx. 2593 | PPGC Louisiana Medicaid Provider Group Agreement (email with attachment) | Personal Cell Phone (ending in -54) |
| 475-5 | Appx. 2739 | PPFA Accreditation & Evaluation Department Accreditation Introductory Call Overview, Script & Communications Template | Non-Party Names (Initials E.I., E.P., A.B., T.H., and D.F.) |
| 475-6 | Appx. 3211 | PPFA 2012 PPGC Accreditation Report | Non-Party Name (Initials E.D.) |
| 475-6 | Appx. 3448 | PPFA 2016 PPST Accreditation Report | Personal E-Mail Address (a-----@gmail.com) |
| 475-6 | Appx. 3547 | PPST Corrective Action Report (Binder 5(A) Tab 506) | Personal E-Mail Address (u-----@gmail.com) |
| 475-7 | Appx. 3662 | PPFA 2012 PPST Accreditation Report | Non-Party Name (Initials E.D.) |
| 475-7 | Appx. 3793 | Email from Lambrecht to Olson fw Final accreditation report for Planned Parenthood of Greater Texas | Personal E-Mail Address (n-----@yahoo.com) |
| 475-7 | Appx. 3872 | Email from White to PPFA re accreditation corrective action plan | Personal E-Mail Address (n-----@yahoo.com); Personal Cell Phone (ending in -06) |
| 475-7 | Appx. 3885 | Email from Johnson to Lambrecht; Frances attaching PPGT Draft Summary Outcome Presentation | Personal Cell Phone (ending in -03) |
| 475-7 | Appx. 3904 | Email from White to Lambrecht et al re Accreditation Resources | Personal Cell Phone (ending in -06) |

| Filing | Appendix Page | Document Name | Non-Party Contact Info. |
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| 475-8 | Appx. 4111 through Appx. 4112 | PPFA Consolidated Financial Statements and Supplementary Information | Confidential Foundation Founders Names (Initials A.F., A.C.B.M.F., B.F., C.T.F., C., D.F., D.L.P.F., D.F., F.F., G.F., G.F., H.F., H.F., I.H.F., I.A.F., I.F., J.C.K.F., J.F., L.D.G.F., M.C.F., P., P.F., R.F.F., R.F.F., R.F., S.R.M.F., S.F.F., S.F., U.U.W.F., U.N.F., W.F.H.F., W.F., B.F., B.P., C.F., F.M.K.F., I.A.F., and W.F.) |
| 475-8 | Appx. 4118 | PPFA 2021 PPGT Access to Care Medicaid Gap Funding Grant Agreement | Personal Cell Phone (ending in -77) |
| 475-8 | Appx. 4131 | PPFA 2021 PPGT Access to Care Medicaid Gap Funding Grant Agreement | Personal Cell Phone (ending in -77) |
| 475-8 | Appx. 4140 | PPFA 2017 Email re Gap Funding Approach & Additional Contingency Planning Details | Personal Cell Phone (ending in -34) |
| 475-8 | Appx. 4389 | PPFA Health Care Investment Program Year 1-4 Reports | Personal Cell Phone (ending in -13) |
| 475-10 | Appx. 4866 | Email from K. Custer to Affiliate CEOs; Subject: Information Request for NPS Motion; dated Mar. 10, 2015; attachments: Highlights from PPFA Program Support for Affiliates; PPFA National Office Services to Affiliates; NPS and Financial Comparison for Affiliates; Health Care Business Model Project | Personal Cell Phone (ending in -34) |
| 475-10 | Appx. 4977 | Email from R. Exnicious re: Introduction to PPFA's Medicaid Reimbursement Toolkit; dated Oct. 28, | Personal Cell Phone (ending in -54) |

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| | | 2019; attachment: Medicaid Reimbursement Toolkit | |
| 475-10 | Appx. 5011 | Email from D. Singiser to K. Lambrecht re: Medicaid Follow-Up Questions; dated Jul. 6, 2017 | Personal Cell Phones (ending in -77 and -46) |
| 475-10 | Appx. 5012 through Appx. 5013 | Email from K. White to M. Turner re: Medicaid Element of Performance (EOP); dated Oct. 21, 2015 | Personal Cell Phones (ending in -06 and -32) |
| 475-10 | Appx. 5017 | Email from PPFA to Affiliates re: Compliance & Medicaid, Health Care Reform Update Newsletter | Personal Cell Phone (ending in -09) |
| 475-10 | Appx. 5024 | Email from PPFA to Affiliates re: Compliance & Medicaid, Health Care Reform Update Newsletter | Personal Cell Phone (ending in -15) |
| 475-10 | Appx. 5070 | PPFA Email re: NPS Dues Forgiveness | Personal Cell Phones (ending in -06 and -71) |
| 475-10 | Appx. 5077 | Health Care Investment Program Update for Oct. 2, 2014 | Personal Cell Phones (ending in -23 and -87) |
| 475-10 | Appx. 5127 | Email re: TX Medicaid termination and whether termination is “paused” during appeal, dated Dec. 21, 2016 | Personal Cell Phone (ending in -34) |
| 475-10 | Appx. 5128 | Email from PPFA to Affiliate CEOs re: PPFA’s Medicaid Gap Fund for Affiliates out of Medicaid | Personal Cell Phone (ending in -34) |
| 475-10 | Appx. 5139 through Appx. 5140 | PPFA Email re: Talking points for Wendy Davis to discuss Texas Medicaid defunding and litigation; dated Oct. 20, 2015 | Personal Cell Phones (ending in -77 and -15) |

| Filing | Appendix Page | Document Name | Non-Party Contact Info. |
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| 475-10 | Appx. 5150 | PPFA Emails to Board Chairs and Affiliate CEOs re: Meeting on Potential Future Options | Personal E-Mail Address (n-----@gmail.com) |
| 475-10 | Appx. 5151 | PPFA Emails to Board Chairs and Affiliate CEOs re: Meeting on Potential Future Options | Personal E-Mail Addresses (c---@m-----.com, a-----@hotmail.com, l-----@gmail.com, b-----@gmail.com, m-----@yahoo.com, a---@aol.com, p-----@comcast.net, a-----@c-----.com, j---@aol.com, j---@l-----.com, m---@e--.org, c-----@mac.com, k-----@verizon.net, c-----@gmail.com, j-----@gmail.com, and k---@me.com) |
| 475-10 | Appx. 5157 | PPFA Email re: New Clinic Budget Sheet | Personal Cell Phone (ending in -31) |
| 475-10 | Appx. 5189 | Email from Trivisonno re New PPFA Building Book for Health Centers | Personal Cell Phone (ending in -13) |
| 475-10 | Appx. 5193 | Email from Sueyoshi to Affil COOs; Affil-PSDs; Affil Chief Execs; Affil CAPS AB; Affil Medical Directors re Direct to Patient Medication Abortion Mail Order Pharmacy Information | Personal Cell Phone (ending in -39) |
| 475-10 | Appx. 5209 | Email from PPFA to Texas Affiliate Medical Director welcoming to PPFA | Personal Cell Phone (ending in -80) |
| 475-10 | Appx. 5219 | Updated from ARMS dated Mar. 2016 re: portraying Planned Parenthood as excellent and stable amid media scrutiny | Non-Party Names (Initials C.B., N.B., C.C., G.C., J.C., W.G., D.H., D.J., T.P., M.R., and J.S.) |
| 475-10 | Appx. 5220 | PPST Compliance, Quality Improvement & Risk Management | Non-Party Name (Initials A.S.) |

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| | | Committee Meeting Agenda with materials; dated Nov. 10, 2016 | |
| 475-10 | Appx. 5304 through Appx. 5306 | Email to K. Lambrecht RE: Directors and Officer's Policy with policy attached; dated May 21, 2021 | Personal Cell Phones (ending in -31 and -77) |
| 475-10 | Appx. 5318 | Email from T. Trivisonno to M. Baxter with Powerpoint and information regarding PPFA Business Operations Team guidelines for assessing Health Center labor and performance; and NCL playbook attached | Personal Cell Phone (ending in -13) |
| 475-10 | Appx. 5442 | PPFA Email to Affiliate CEOs sharing preview materials for upcoming National Conference; dated Mar. 17, 2021 | Personal Cell Phone (ending in -03) |
| 475-10 | Appx. 5453 | Research & Analysis: An Audit by Script Architecture prepared for PPFA re: facility upgrades to PP Affiliates; PowerPoint presentation; dated Mar. 30, 2020 | Non-Party Names (Initials D.R., A.M., T.L., and J.Z.) |
| 475-10 | Appx. 5520 | Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting Agenda and Materials (with attachments); dated Feb. 24, 2016 | Personal Email Address (k-----@yahoo.com); Non-Party Name (Initials S.F.) |
| 475-10 | Appx. 5522 through Appx. 5523 | Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting Agenda and Materials (with attachments); dated Feb. 24, 2016 | Non-Party Names (names of the President and CEOs of over 60 Non-Party Affiliates and several other Non-Party Names) |
| 475-10 | Appx. 5536 | Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting | Non-Party Names (Initials J.A.C.) |

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| | | Agenda and Materials (with attachments); dated Feb. 24, 2016 | |
| 475-10 | Appx. 5563 through Appx. 5564 | Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting Agenda and Materials (with attachments); dated Feb. 24, 2016 | Non-Party Names (Initials S.F., B.Z., B.H., and K.G.) |
| 475-11 | Appx. 5579 | Emails received by PPGT regarding the 60-Day Medicaid/Medicare Overpayment Repayment Rule | Personal Cell Phone (ending in -17) |
| 475-11 | Appx. 5651 | PPFA Email to Affiliates re: Health Care Reform Update Newsletter – June 2013 Issue | Personal Cell Phone (ending in -15) |
| 475-13 | Appx. 6123 | Email from K. Lambrecht with subject: 5th Circuit Ruling re: Planned Parenthood in Medicaid and attaching the Court's Opinion; dated Nov. 23, 2020 | Personal Cell Phone (ending in -77) |
| 475-13 | Appx. 6126 | Email from K. Lambrecht with subject: 5th Circuit Ruling re: Planned Parenthood in Medicaid and attaching the Court's Opinion; dated Nov. 23, 2020 | Personal Cell Phone (ending in -13) |
| 475-13 | Appx. 6128 | Email from K. Lambrecht with subject: 5th Circuit Ruling re: Planned Parenthood in Medicaid and attaching the Court's Opinion; dated Nov. 23, 2020 | Personal Cell Phone (ending in -71) |
| 475-13 | Appx. 6131 | Email from K. Lambrecht re: Texas affiliates' termination from Medicaid | Personal Cell Phone (ending in -77) |

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| | | and PPGT and PPFA talking points, dated Oct. 19, 2015 | |
| 475-13 | Appx. 6142 through Appx. 6143 | Email from McKinney to Sannes re 5th Circuit Ruling re Planned Parenthood in Medicaid | Personal Cell Phones (ending in -31 and -77) |
| 482-1 | Appx. 6602 through Appx. 6603 | Email re Friday's SAP/PPGC Meeting; dated March 1, 2017 | Personal Cell Phones (ending in -13, -58, and -12) |
| 482-1 | Appx. 6641 through Appx. 6642 | Email re Wendy Davis National Media Tonight; dated October 20, 2015 | Personal Cell Phones (ending in -77 and -15) |
| 482-1 | Appx. 6662 through Appx. 6663 | Email re Minutes from August 2019 Fiduciary Committee Meeting; dated October 15, 2019 | Personal Cell Phone (ending in -65) Non-Party Name and Contact Information (Initials T.P.; t----@fiallc.com) |
| 482-1 | Appx. 6672 | Email re agenda and background materials for 2/6 & 2/7 mtgs; dated February 4, 2013 | Personal Cell Phone (ending in -23) |
| 482-1 | Appx. 6677 through Appx. 6678 | Email re agenda and background materials for 2/6 & 2/7 mtgs; dated February 4, 2013 | Non-Party Names (Initials T.H., P.G., C.H., N.O., N.G., K.H., M.C., D.L., T.Z., S.H., C.F., L.C., A.K.) |
| 482-1 | Appx. 6692 | Email re DHHS OIG Release of New Guidance for Health Care Boards; dated April 21, 2015 | Personal Cell Phone (ending in -36) |
| 482-1 | Appx. 6761 | Email re Update from Foundational Group; dated May 4, 2018 | Personal Cell Phone (ending in -52) |
| 482-2 | Appx. 6871 | Email re Upcoming Webinar on New Managed Care Rule; dated May 25, 2016 | Personal Cell Phone (ending in -05) |

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| 482-2 | Appx. 6877 | Email re Upcoming Webinar on New Managed Care Rule; dated May 25, 2016 | Personal Cell Phone (ending in -05) |
| 482-2 | Appx. 6879 | Email re 5th Circuit Ruling re: Planned Parenthood in Medicaid; dated November 23, 2020 | Personal Cell Phone (ending in -77) |
| 482-2 | Appx. 6884 | Email re Medicaid Issues in the Media; dated October 19, 2015 | Personal Cell Phone (ending in -77) |
| 482-2 | Appx. 6885 | Email re Very interesting from PPFA; dated February 5, 2014 | Personal Cell Phone (ending in -09) |
| 482-2 | Appx. 6892 | Email re Very interesting from PPFA; dated February 5, 2014 | Personal Cell Phone (ending in -15) |
| 482-2 | Appx. 6974 | Email re President Biden Takes Action on Sexual and Reproductive Health; dated January 29, 2021 | Personal Cell Phone (ending in -77) |
| 482-2 | Appx. 6985 | Email re President Biden Takes Action on Sexual and Reproductive Health; dated January 29, 2021 | Personal Cell Phone (ending in -71) |
| 482-2 | Appx. 6988 through Appx. 6992 | Email re Restricted PPOL email for Texas; dated September 11, 2021 | Personal Cell Phones (ending in -77 and -59) |
| 482-2 | Appx. 7041 | Email re Gap Funding Approach & Additional Contingency Planning Details; dated June 29, 2017 | Personal Cell Phone (ending in -34) |
| 482-2 | Appx. 7042 through Appx. 7045 | Email re GPO Agreement Renewal; dated December 17, 2013 | Non-Party Names and Contact Information (names, emails, and phone numbers for Initials T.R., J.B.) Personal Cell Phone (ending in -77) |

| Filing | Appendix Page | Document Name | Non-Party Contact Info. |
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| 482-2 | Appx. 7166 through Appx. 7167 | Email re following up – contract scope, material from the archives re: Lozier report; dated January 27, 2017 | Non-Party Name and Contact Information (Initials A.H., m-----@gmail.com; Initials M.C., m-----@brownmccaroll.com, phone number ending in -68; Initials L.G., l----m----@brownmccaroll.com, phone number ending in -78) Personal Cell Phone (ending in -29) |
| 482-2 | Appx. 7172 | Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives | Non-Party Names (Initials M.G., J.S.) |
| 482-2 | Appx. 7175 | Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives | Non-Party Names (Initials M.G., J.S.) |
| 482-2 | Appx. 7179 | Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives | Non-Party Name (Initials M.G.) |
| 482-2 | Appx. 7208 | Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives | Non-Party Name and Contact Information (Initials J.S., j----@AG.ny.gov) |
| 472-1 | 116 | Excerpts from 10/6/2022 Expert Report of Louis G. Dudney | Personal Cell Phone (ending in -78) |